



THOMAS L. WELCH
CHAIRMAN

STATE OF MAINE
PUBLIC UTILITIES COMMISSION
242 STATE STREET
18 STATE HOUSE STATION
AUGUSTA, MAINE
04333-0018

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WILLIAM M. NUGENT
STEPHEN L. DIAMOND
COMMISSIONERS

December 1, 1999

VIA FEDERAL EXPRESS

Margalie Salas
Portals II
445 12th Street, SW
Suite TW-A325
Washington, DC 20554

Re: NSD File No. 99-82
CC Docket No. 96-98
NSD File No. L-99-83

Dear Ms. Salas:

Enclosed for filing please find an original and 4 copies of the Maine Public Utilities Commission's Comments in Support of the Petitions of the Indiana Regulatory Commission, Missouri Public Service Commission, and Nebraska Public Service Commission for Delegation of Additional Authority to Implement Number Conservation Measures.

Sincerely,


Trina M. Bragdon

cc: Al McCloud
Service List (via U.S. Mail)



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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION

| | | |
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| In the Matter of |) | |
| |) | |
| Petition of the Indiana Regulatory |) | NSD File No. L-99-82 |
| Commission for Delegation of Additional |) | |
| Authority to Implement Number |) | |
| Conservation Measures |) | |
| |) | |
| Petition of the Missouri Public Service |) | NSD File No. L- |
| Commission's for Additional Delegated |) | CC Docket No. 96-98 |
| Authority to Implement Number Conservation |) | |
| Measures in the 314, 417, 573, 636, 660 |) | |
| and 816 Area Codes |) | |
| |) | |
| Petition of the Nebraska Public Service |) | |
| Commission for Delegation of Additional |) | NSD File No. L-99-83 |
| Authority to Implement Number Conservation |) | |
| Methods for the 402 Area Code |) | |

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**COMMENTS OF THE MAINE PUBLIC UTILITIES COMMISSION
IN SUPPORT OF THE PETITIONS OF THE INDIANA REGULATORY
COMMISSION, MISSOURI PUBLIC SERVICE COMMISSION, AND NEBRASKA
PUBLIC SERVICE COMMISSION FOR DELAGATION OF ADDITIONAL
AUTHORITY TO IMPLEMENT NUMBER CONSERVATION MEASURES**

The Maine Public Utilities Commission (MPUC) respectfully requests that the Common Carrier Bureau (CCB) grant the Petition of the Indiana Regulatory Commission for Delegation of Additional Authority to Implement Number Conservation Measures, the Petition of the Missouri Public Service Commission for Additional Delegated Authority to Implement Number Conservation Measures in the 314, 417, 573, 636, 660, and 816 Area Codes, and the Petition of the Nebraska Public Service Commission for Delegation of Additional Authority to Implement Number Conservation Methods for the 402 Area Code (collectively "Petitions"). The MPUC urges the CCB to act on these petitions as soon as possible so that all three states may take immediate

steps to alleviate the current numbering crisis in their respective states. As the FCC itself has already admitted in its Notice of Proposed Rulemaking (NPRM),¹ states need additional delegated authority on numbering issues to ensure that consumers are not burdened with unnecessary costs and inconvenience, as well as to ensure that the NANP does not prematurely exhaust.

I. Delegation of Authority Similar To The Delegations to California, New York, Florida, Massachusetts, Maine, Wisconsin, Connecticut, Ohio, New Hampshire, and Texas Will Not Negatively Impact the Development of National Numbering Rules

Granting the Petitions will not negatively impact the Federal Communications Commission's (FCC) consideration and development of national numbering rules nor will it result in a patchwork of state measures. The FCC's orders granting authority to Maine, Massachusetts, California, New York, Florida, Wisconsin, Connecticut, Ohio, New Hampshire, and Texas to begin thousand block pooling and implement other number conservation measures have struck the proper balance between allowing states with urgent needs to move forward and ensuring some level of uniformity (by requiring states to coordinate). The MPUC urges the CCB to delegate similar authority to Indiana, Missouri and Nebraska.

Staff from Missouri and Indiana have been participating in state numbering coordination efforts over the past several months and it is expected that Nebraska will join those efforts if requested by the FCC. Indeed, Missouri and Indiana have been participating in weekly state conference calls relating to the coordination required by the FCC's orders granting the petitions of Maine, Massachusetts, California, Florida, and

¹ Numbering Resource Optimization, Notice of Proposed Rulemaking, CC Docket No. 99-200, FCC 99-122 (June 2, 1999).

New York and thus are fully aware of the many issues that are arising as those states move forward with their new authority. The participation of Missouri and Indiana in this process reflects the importance of this issue and the willingness of states to work together to ensure uniformity of state positions.

II. The Petitions' Requests Are Similar to Those Already Granted To Other States

The specific authority requested by Indiana, Missouri and Nebraska is similar to that already granted to the MPUC and other states. The MPUC has already submitted numerous comments on such measures in other dockets² and incorporates them herein by reference. The MPUC urges the CCB to grant the Petitions in full.

III. Conclusion

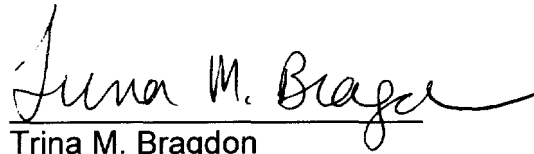
Current conditions require immediate action in order to protect consumers in Indiana, Missouri and Nebraska from the unnecessary expense and confusion

² See Comments In Support of the Petition of the California Public Utilities Commission and the People of the State of California For a Delegation of Additional Authority Pertaining to Area Code Relief and to NXX Code Conservation Measures, DA 99-108, NSD File No. L-99-928 (July 15, 1999), Comments in Support of the Florida Public Service Commission's Petition for Expedited Decision For Grant of Authority To Implement Number Conservation Measures, DA 99-725, NSD File No. L-99-23 (April 2, 1999), Comment in Support of the Massachusetts Department of Telecommunications and Energy's Request for Additional Authority to Implement Various Area Code Conservation Methods in the 508, 617, 781, and 978 Area Codes, DA 99-461 (April 2, 1999), Comments in Support of the New York State Department of Public Service Petition For Additional Delegated Authority To Implement Number Conservation Measures, DA 99-462 (April 2, 1999), Petition of the Public Utility Commission of Texas for Expedited Decision for Delegation of Authority to Implement Number Conservation Measures, NSD File No. L-99-55 (August 27, 1999), Connecticut Department of Public Utility Control's (CDPUC) Petition for Delegation of Additional Authority, NSD File No. L-99-62 (August 27, 1999).

associated with new area codes as well as to ensure that sufficient numbering resources are available to all carriers. Accordingly, the MPUC respectfully requests that the CCB grant the Petitions of Indiana, Missouri, and Nebraska.

Respectfully submitted,

MAINE PUBLIC UTILITIES COMMISSION

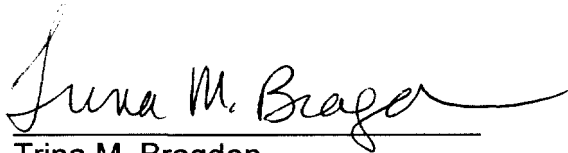
A handwritten signature in black ink, reading "Trina M. Bragdon", written over a horizontal line.

Trina M. Bragdon
Staff Attorney

Dated: December 1, 1999

CERTIFICATE OF SERVICE

I, Trina M. Bragdon, certify that a copy of the Comments of the Maine Public Utilities Commission in Support of the Petitions of the Indiana Regulatory Commission for Delegation of Additional Authority to Implement Number Conservation Measures, the Petition of the Missouri Public Service Commission for Additional Delegated Authority to Implement Number Conservation Measures in the 314, 417, 573, 636, 660, and 816 Area codes, and the Petition of the Nebraska Public Service Commission for Delegation of Additional Authority to Implement Number Conservation Methods for the 402 Area Code was served today, *via* U.S. mail, on the persons listed on the attached service list.


Trina M. Bragdon

Dated: December 1, 1999

SERVICE LIST

Gene Hand
Nebraska Public Service Commission
300 The Atrium 1200 N. St.
P.O. Box 94927
Lincoln, NE 68509

Anthony Clark
Missouri Public Service Commission
Truman State Office Bldg 530
310 W. High Street
P.O. Box 360
Jefferson City, MO 65102

Brian Mahern
Indiana Utility Regulatory Commission
302 W. Washington St. E 306
Indianapolis, IN 46204